

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 11:47:51 AM
Last Modified: Tuesday, January 30, 2018 11:53:46 AM
Time Spent: 00:05:55
IP Address: 184.53.48.50

Page 1

Q1 First Name (Optional)

Will

Q2 Last Name (Optional)

Stockwin

Q3 Organization (Optional)

Mayor, Colfax, CA

Q4 Title (Optional)

Mayor

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

State law now prohibits retailers from advertising on billboards fronting interstate highways "that cross state lines." Here in Colfax we now have a local retailer who cannot advertise on the I-80 digital billboard here in town, but a retailer (New Leaf) from Nevada can. Why does state law put California retailers at such a gross disadvantage? Either ban all cannabis advertising or at least let California retailers compete fairly with out of state competition.

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 1:12:33 PM
Last Modified: Tuesday, January 30, 2018 1:14:23 PM
Time Spent: 00:01:50
IP Address: 45.61.19.234

Page 1

Q1 First Name (Optional)

Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee**Q6** Feedback for Subcommittee

How to deal with environmental fallout because of packaging requirements. Since everything needs to be pre-packaged, there has to be a way to get the customer back to a retail location and just refill their package. This would prevent environmental waste (package after package after package being disposed).

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 1:50:31 PM
Last Modified: Tuesday, January 30, 2018 1:53:15 PM
Time Spent: 00:02:43
IP Address: 50.254.117.221

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Retailers Subcommittee**

Q6 Feedback for Subcommittee

Currently there are no limits to the number of licenses dispensary owners can hold. How do we protect smaller regional dispensary applicants from being crushed by the big guys? Perhaps limit them to a certain number for a few years? Otherwise a huge company will come in and monopolize the process and monopolize this opportunity.

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 1:53:21 PM
Last Modified: Tuesday, January 30, 2018 1:54:40 PM
Time Spent: 00:01:19
IP Address: 50.254.117.221

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Retailers Subcommittee**

Q6 Feedback for Subcommittee

Municipalities are balking at issuing ordinances unless forced by costly ballot measures. How can we educate city councilpersons and municipal elected officials about cannabis so they don't fear the commercial entities?

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 2:05:21 PM
Last Modified: Tuesday, January 30, 2018 2:09:00 PM
Time Spent: 00:03:39
IP Address: 47.158.91.82

Page 1

Q1 First Name (Optional)

Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee**Q6** Feedback for Subcommittee

Appreciate any efforts to safeguard medical products (CBD) for medical users only. There is a growing shortage that can only caused by recreational buyers.

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 2:55:01 PM
Last Modified: Tuesday, January 30, 2018 2:58:38 PM
Time Spent: 00:03:36
IP Address: 172.87.154.210

Page 1

Q1 First Name (Optional)

Kelvin

Q2 Last Name (Optional)

Keith

Q3 Organization (Optional)

Tidel

Q4 Title (Optional)

Business Development

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

I would venture to say Banking is one of the retail sectors top concerns. I would recommend exploring cash management solutions, such as smart safes, as a both a stop gap and longer solution for the industry.

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 4:09:14 PM
Last Modified: Tuesday, January 30, 2018 4:13:46 PM
Time Spent: 00:04:32
IP Address: 76.89.240.225

Page 1

Q1 First Name (Optional)

Karin

Q2 Last Name (Optional)

Clarke

Q3 Organization (Optional)

White Horse Compliance

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Training and record of training of employees is mentioned in the BCC regulations but there is no specific guidance for what they employees need to be trained on. Basic training on responsible vending of cannabis according to the regulations should be a great start. The staff speaking to customers and patients is of great concern, most of the budtenders do not know the regulations and are not trained.

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 6:29:47 PM
Last Modified: Tuesday, January 30, 2018 6:33:45 PM
Time Spent: 00:03:58
IP Address: 198.72.196.59

Page 1

Q1 First Name (Optional)

douglas

Q2 Last Name (Optional)

viltz

Q3 Organization (Optional)

viltz security services

Q4 Title (Optional)

president/ceo

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

I think the issue of on-site professional security needs to be addressed. What will the requirements be?

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, January 31, 2018 10:13:50 AM
Last Modified: Wednesday, January 31, 2018 10:25:59 AM
Time Spent: 00:12:09
IP Address: 107.219.157.103

Page 1

Q1 First Name (Optional)

Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Taxes

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee**Q6** Feedback for Subcommittee

Why has California not followed the model set by Colorado regarding Medical Marijuana Patients!? Colorado medical marijuana patients DO NOT pay EXCISE TAX! They pay 2.9% in State sales tax & also local businesses tax. Combined state & local tax averages 6.163%. Highest tax in state with local added is 11.20% in the city of Winter Park. I've also included links to what I've discussed in detail with you. The taxes in California for MMID patients = INSANITY! There is no reason MMID patients should have to pay the Excise Tax! MMID patients should only pay sales tax & should not have to pay excise tax & local business tax. No MMID patient should have to pay more than a 9.50% in sales tax. And all dispensary's must be required to offer at least a 5-10% discount for MMID patients who are also disabled or on disability! That would help lower taxes on MMID patients. If California doesn't do this, then the state will open the BLACK MARKET & Marijuana will continue to thrive unregulated.

#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, January 31, 2018 11:18:01 AM
Last Modified: Wednesday, January 31, 2018 11:21:02 AM
Time Spent: 00:03:00
IP Address: 75.144.255.58

Page 1

Q1 First Name (Optional)

Adriana

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Dispensary Manager

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

The excise tax is defeating the history of medical marijuana and making safe and affordable access, for those who carried this industry on their backs, near impossible. The power has shifted to those who we were promised would not be given the opportunity to take over-the distributors, big money, and the most out of touch people from the plant.

#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, January 31, 2018 3:42:21 PM
Last Modified: Wednesday, January 31, 2018 3:43:14 PM
Time Spent: 00:00:52
IP Address: 198.0.209.73

Page 1

Q1 First Name (Optional)

Bob

Q2 Last Name (Optional)

Saltz

Q3 Organization (Optional)

Prevention Research Center, Pacific Institute for Research & Evaluation

Q4 Title (Optional)

Senior Scientist

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

In light of the new law in California requiring that alcohol servers be trained in responsible alcoholic beverage sale practices (AB-1221)¹, we urge the Bureau of Cannabis Control to adopt a requirement that all individuals who handle marijuana products in medicinal and retail premises complete training in responsible marijuana vendor practices. It is wise to expect the same level of professionalism among owners, managers, and employees of the marijuana premises as in alcohol premises to ensure responsible sales of marijuana to keep California communities safe. Models already exist in other states for responsible marijuana vendor training and certification, with curriculum standards and state-approved training providers, that could be easily and quickly implemented in California. With funding from the National Institutes of Health, our research team is evaluating an online responsible marijuana vendor training program in Colorado, Washington State, and Oregon that teaches state regulations and key skills, such as ID checking and refusing service to intoxicated customers. The training has been acceptable to personnel who sell marijuana products and shows promise for improving responsible sales practices in these premises.

#12

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, February 01, 2018 11:16:14 AM
Last Modified: Thursday, February 01, 2018 11:20:27 AM
Time Spent: 00:04:13
IP Address: 68.118.143.141

Page 1

Q1 First Name (Optional)

Diana

Q2 Last Name (Optional)

Holte

Q3 Organization (Optional)

High Desert Cannabis Association

Q4 Title (Optional)

Secretary on the Board

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee**Q6 Feedback for Subcommittee**

First we would like to address the matter of timing, in terms of when cannabis companies go "online". It is an unreasonable request to implement a set of rules in 1 month after regulations are announced. One municipality out of several hundreds of cities and dozens of counties in California as an example, City and County of Riverside, California are forecasting ordinances and regulations by November of 2018, after they put taxation to a vote. This timeframe doesn't work for small community cannabis businesses who have no regulations to abide by, and will still be prosecuted and harassed locally; unable to comply with new regulations set by the BCC. HDCA envisions that all 12 months of the year 2018 as a transitional period for businesses in California, giving cities and local municipalities time to create workshops, ordinances, and voting to assess the city taxes for cannabis businesses in November 2018. Since the BCC has made provisions for the cities to collect local taxes only by a 50% vote, it makes sense to extend the period a year to January 2019 as to not burden California residents with the costs associated with a special vote, but in the November 2018 General Elections. That would also incentivize the local municipalities to create ordinances for cannabis commerce, and to retain those tax funds for the city general fund instead of specific funds only accessed for specific purpose.

#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, February 01, 2018 1:50:50 PM
Last Modified: Thursday, February 01, 2018 1:56:50 PM
Time Spent: 00:06:00
IP Address: 98.234.230.36

Page 1

Q1 First Name (Optional)

Jonathan

Q2 Last Name (Optional)

Kramer

Q3 Organization (Optional)

NVizhon Group LLC

Q4 Title (Optional)

President

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Similar to the uproar from small cultivators, I would like to suggest the bureaus does something to prevent the small entrepreneur from being overcome by big \$\$ by not allowing them to purchase multiple licenses at one time thereby creating a monopoly. I also think there's a need to somehow police the innumerable online retailers selling to CA residents. I don't see any licensing or guidelines for them so they escape compliance completely as well as the cost of doing business. And finally I feel a dispensary should be able to buy direct from a licensed manufacturer whose products pass state testing, rather than be forced to purchase from a licensed distributor. Vendor relationship in any industry are key to getting the best products, maintaining inventory and educating the customer which in this case is crucial.

#14

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, February 01, 2018 3:25:41 PM
Last Modified: Thursday, February 01, 2018 3:26:27 PM
Time Spent: 00:00:46
IP Address: 174.211.6.95

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Retailers Subcommittee**

Q6 Feedback for Subcommittee Respondent skipped this question

#15

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, February 01, 2018 4:13:03 PM
Last Modified: Thursday, February 01, 2018 4:20:41 PM
Time Spent: 00:07:38
IP Address: 96.72.190.13

Page 1

Q1 First Name (Optional)

Adrienne

Q2 Last Name (Optional)

Mulligan

Q3 Organization (Optional)

FLRish/Harborside

Q4 Title (Optional)

Supply Chain Manager

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Free Products - it is very difficult to successfully educate consumers on products when our staff is not allowed to receive any free samples. Many other industries use staff samples as a way to educate their customers. IE: servers in restaurants try the specials. That way they can tell customers what it tastes like.

We need to be able to provide samples to our staff members for educational purposes.

#16

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, February 02, 2018 10:03:05 AM
Last Modified: Friday, February 02, 2018 10:06:45 AM
Time Spent: 00:03:40
IP Address: 98.234.230.36

Page 1

Q1 First Name (Optional)

Jonathan

Q2 Last Name (Optional)

Kramer

Q3 Organization (Optional)

NVizhon Group LLC

Q4 Title (Optional)

President

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Since we are in the research stage of our business model, and extensive poll was done among potential customers from all age groups. When told the tax rate is in the 40% range, every single one of them balked. When we look at what other states charge, CA is nearly 3 times or MORE with an excise tax so high it potentially stifles business and drives the customer to the black market. You can learn the tax rates here on Leafly's site: <https://goo.gl/kaS4v3>

I URGE the Bureau to reconsider the taxes and if not, its obvious a major push by the black market may likely ensue.

#17

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, February 02, 2018 11:29:38 AM
Last Modified: Friday, February 02, 2018 11:43:21 AM
Time Spent: 00:13:42
IP Address: 50.197.177.105

Page 1

Q1 First Name (Optional)

Sabrina

Q2 Last Name (Optional)

Fendrick

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Retailer employees should be allowed to receive free product samples from distributors so they can sample and select the best products to put on the shelf. A retailer's success is tied to their ability to put quality products on the shelf. Since employees are unable to sample potential products, there is no way for them to select the best products and describe them to the customers.

Doctors are allowed to receive free samples of regulated pharmaceuticals that work within the DEA's drug tracking system, so it should also work in METRC's track and trace system. The pharmaceutical industry marks sample products as "not for sale."

#18

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, February 02, 2018 5:49:13 PM
Last Modified: Friday, February 02, 2018 5:49:52 PM
Time Spent: 00:00:39
IP Address: 71.84.6.117

Page 1

Q1 First Name (Optional)

Cyndee

Q2 Last Name (Optional)

Smolik

Q3 Organization (Optional)

Best Buds Solutions

Q4 Title (Optional)

Owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Not sure which will be handling taxes but taxing the dry flowers and taxing retailers for finished products is double taxation. Flowers should only be taxed at the retail level if they aren't going into finished product.

#19

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, February 04, 2018 8:31:43 AM
Last Modified: Sunday, February 04, 2018 8:41:50 AM
Time Spent: 00:10:07
IP Address: 184.189.118.61

Page 1

Q1 First Name (Optional)

Belinda

Q2 Last Name (Optional)

Smith

Q3 Organization (Optional)

Outco

Q4 Title (Optional)

Retail Partner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Please add the following items to your agenda:

- Need a banking solution: consider banding together with other adult-use states to sue Fed Gov to allow banking.
 - Merchandising: not all products need to be under lock and key.
-

#20

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, February 04, 2018 8:34:44 PM
Last Modified: Sunday, February 04, 2018 8:49:33 PM
Time Spent: 00:14:48
IP Address: 198.27.190.15

Page 1

Q1 First Name (Optional)

J

Q2 Last Name (Optional)

T

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Respondent skipped this question

#21

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 12:03:01 PM
Last Modified: Monday, February 05, 2018 12:04:52 PM
Time Spent: 00:01:50
IP Address: 73.231.137.40

Page 1

Q1 First Name (Optional)

Stephen

Q2 Last Name (Optional)

Shub

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

There are no logical rules or regulations regarding network security, patient/customer information or sales records. This is an incredibly hackable industry.

#22

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 12:12:39 PM
Last Modified: Monday, February 05, 2018 12:16:50 PM
Time Spent: 00:04:11
IP Address: 50.250.197.190

Page 1

Q1 First Name (Optional)

Nancy

Q2 Last Name (Optional)

Belli

Q3 Organization (Optional)

Cannabis Consultant

Q4 Title (Optional)

Owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

One of the biggest issues that still needs to be further refined in the State regulations is cannabis waste. Cannabis waste is a problematic waste stream and needs to be properly addressed at all levels as this waste is highly desirable and can be harmful if someone obtains it in the wrong hands. We are seeing that current retailer's trash receptacles are being raided by the homeless and children. As a result, the State Regulations need to provide further detail on proper cannabis waste management is crucial so there are no social and health impacts. The reality is that operators will not manage the cannabis waste themselves by rendering it neutralized (unrecognizable and unusable) per the State regulations. This is because many operators do not have the space or means to render the cannabis waste, and throwing it in the trash receptacles is non-compliant per State Regulations.

Existing trash companies are not going to solve the problem of trash receptacles being raided. The State Regulations should be updated to require all retail cannabis waste be handled by a third party cannabis licensed waste management company to handle all cannabis waste (similar to a standard trash service). Additionally, this cannabis waste management company MUST have the appropriate cannabis licenses to conduct the business such as a cannabis distribution license and cannabis manufacturing license (processing license). The distribution license will allow the cannabis waste management company to pick up the untreated cannabis since it is still considered cannabis product, and the manufacturing (processing) license will allow the waste management company to render the cannabis product into neutralized cannabis waste. These licenses not only make the cannabis waste management company compliant, but also helps with the track and tracing of all stages of the cannabis product. This will help solve the issue of trash receptacles being raided and provide the cannabis waste management service the industry needs to comply with State regulations.

The State Regulations should be updated to require all cannabis operators either hire a third party cannabis license waste management company to handle cannabis waste, or require the operator to hire a third party consultant to verify their waste is being properly rendered to show to the State. These requirements will give retailers options in addressing their cannabis waste, and help make State Enforcement more efficient as the State Enforcement Agency can simply request proof of a third party cannabis waste management company, or third party verification that waste was properly handled. This will avoid any loopholes in which the cannabis product goes undetected and if no documentation can be provided, then the State Enforcement Agency knows if the retailer is not compliantly handling their waste.

#23

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 2:20:30 PM
Last Modified: Monday, February 05, 2018 2:33:21 PM
Time Spent: 00:12:51
IP Address: 75.82.32.151

Page 1

Q1 First Name (Optional)

Zachary

Q2 Last Name (Optional)

Pitts

Q3 Organization (Optional)

California Cannabis Delivery Alliance

Q4 Title (Optional)

President

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

1.) Tiered delivery vehicles:

The emergency regulations presently require delivery services to use enclosed automobiles with a maximum carrying capacity of \$3,000. Rather than a one-size-fits-all approach, CCDA favors allowing three tiers of delivery vehicles, with varying carrying capacities.

The first, lowest tier, would allow unenclosed vehicles to carry up to \$1,500 of cannabis and cannabis products, while still requiring storage in an enclosed and secured compartment. The second, medium tier, would follow the current regulations and allow for the vehicle to carry up to \$5,000 of cannabis and cannabis products. The third, high tier, would follow the regulations for distributor-transport drivers, with no regulatory cap on their carrying capacity. This would include the requirement for the delivery service to obtain a motor carrier permit.

A tiered structure such as this would reflect the diversity of size and scope of delivery businesses currently in operation in California.

2.) Delivery Request Receipts:

The delivery request receipt has several requirements that are both burdensome and invasive for delivery services to comply with. The first being the requirement that every employee involved with the fulfillment of the order be listed and sign on the request receipt. When multiple employees are involved in fulfillment of an order, the company should be able to designate either a primary employee to sign for the document or allow the last employee to review the order to be listed.

Additionally, the delivery request receipt requires delivery services to include the address of their licensed premises on the receipt. This presents significant and unnecessary exposure for businesses that reduce their risk profile by remaining discrete, and a safer solution that follows the intent of the law would be to include their state license number rather than their address.

3.) Facilitate Overnight and Long-Distance Delivery:

The ability to deliver cannabis overnight is questionable at best under the state regulations, as they define a delivery beginning when the driver departs and ending on their return to the retailer, during the hours of 6am and 10pm. A higher security delivery vehicle that meets the standards for distribution-transport should be allowed to transport overnight so long as they are not delivering cannabis to consumers except during the legal operating hours. Additionally, if such a business was operating on a cash-less basis, there should not be a need for the vehicle to return immediately upon conclusion of its route or within the designated hours of operation. Lastly, the regulations should allow for long-distance delivery, whether between multiple drivers or licensed hubs, in order to serve the California marketplace.

#24

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 3:13:45 PM
Last Modified: Monday, February 05, 2018 3:13:59 PM
Time Spent: 00:00:13
IP Address: 159.83.252.213

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Retailers Subcommittee**

Q6 Feedback for Subcommittee

Request to change regulation to authorize a Local Health Department or Health Officer to have their permit and/or inspection activities apply to the cities within a county

#25

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 2:14:44 PM
Last Modified: Monday, February 05, 2018 3:16:28 PM
Time Spent: 01:01:43
IP Address: 173.167.104.89

Page 1

Q1 First Name (Optional)

Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee**Q6** Feedback for Subcommittee

Hello, we wanted to receive clarification on retaining records relating to our former medicinal patients.

We are not sure if patient records are protected under HIPAA regulations, and now that it is no longer required for customers to sign patient / member agreements - we would like to know if we are required to retain the medicinal agreements, and if so for how long?

#26

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 5:36:06 PM
Last Modified: Monday, February 05, 2018 5:57:13 PM
Time Spent: 00:21:06
IP Address: 166.216.158.31

Page 1

Q1 First Name (Optional)

Caleb

Q2 Last Name (Optional)

Kouns

Q3 Organization (Optional)

Lifted Health & Wellness

Q4 Title (Optional)

Owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

To whom it may concern:

I am the owner of a non-storefront delivery-only retail business. I have been operating in San Francisco since 2010. My foremost point of feedback is in regards to what types of delivery vehicles should be allowed. I have been delivering using motorcycles and scooters, exclusively, for over 7 years, and have not had one incident of theft.

There are two reasons for this perfect record. First, we have a two stage patient verification process where we send a driver out to meet and ID check any new patient BEFORE THEY ARE ABLE TO PLACE A DELIVERY ORDER. This allows us to vett potential patients, in person, before we send anyone out with medicine. This added layer of protection virtually eliminates any possibility of theft — no one is going to give us their actual ID and then rob us, and this way we are 100% certain that the person placing the order is the person who's ID we have on file.

The second reason for our seven+ year run of theft-free deliveries is that we have an on-demand business model. No other service out there does exclusive on-demand delivery. As far as I'm aware, the BCC has only ever been exposed to the spoke-and-hub mode of delivery, where drivers roam within a small area in cars packed with thousands of dollars of product and cash, just asking to get robbed, a model very similar to Lyft or Uber. My drivers never go out with more than \$500 in product, which is always secured in a locking top case, mounted on the rear seat of the motorcycle or scooter. With an average order size of \$90 and an average order load of 3 orders per delivery run, my drivers carry an average of \$270 of product on them. Additionally, 85% of our sales are paid by debit/credit, meaning a driver shouldn't really ever have more than \$40 in cash at any given time.

The safety of my drivers is my #1 priority, and I believe I have created the absolute safest way to deliver cannabis. There is very little cash involved, the on-demand nature of our model ensures that a driver won't ever have more than a few hundred dollars worth of cannabis on them, all of which is secured in a locking top case. And with our added layer of ID verification, our system really is pretty bullet proof.

Thank you for your time and please consider allowing businesses such as mine with proven track records of safe and theft-free delivery to use un-enclosed vehicles for delivery.

#27

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 9:55:03 PM
Last Modified: Monday, February 05, 2018 9:57:03 PM
Time Spent: 00:01:59
IP Address: 184.184.240.2

Page 1

Q1 First Name (Optional)

Stephanie

Q2 Last Name (Optional)

Hopper

Q3 Organization (Optional)

Canndescent

Q4 Title (Optional)

Government Affairs

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

1. The State of California allows legal sales of cannabis. It is responsible public policy to then create rules that identify locations that allow legal consumption of the purchased cannabis. California does have consumption lounges similar to cigar bars. We would like to see social consumption extended to include tasting rooms similar to wineries. Cannabis retailers could sell small amounts of product to consumers who could then sample the products on site. This could be a different type of retail license.
 2. Consumption of tobacco on licensed premises. Is this limited to specific licensed premises or does this apply to all types of licensed premises?
-

#28

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 12:33:26 AM
Last Modified: Tuesday, February 06, 2018 12:41:39 AM
Time Spent: 00:08:13
IP Address: 47.32.143.88

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Retailers Subcommittee**

Q6 Feedback for Subcommittee

You have (2) categories:

- 1 - Retailers
- 2 - Non-storefront Retailers

But you treat the Non-storefront Retailers as if they are the same as the retailers. They are NOT.

The Non-storefront Retailers should have their own security requirements & procedures.

THE BIGGEST PROBLEM YOU ARE CREATING FOR THE NON-STOREFRONT RETAILERS IS SAFETY.

The Non-storefront Retailer's premise address should NOT be listed on the BCC's website.

#29

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 11:15:48 AM
Last Modified: Tuesday, February 06, 2018 11:21:23 AM
Time Spent: 00:05:35
IP Address: 50.250.197.190

Page 1

Q1 First Name (Optional)

Brian

Q2 Last Name (Optional)

Kahn

Q3 Organization (Optional)

Cannabis Operators

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

The regulations need to be updated to properly address who is able to properly manage all the cannabis waste that will be created. More specifically, the regulations need to ensure that if a cannabis operator is going to utilize a third party cannabis waste management company, the cannabis waste management company must obtain the proper cannabis licenses to transport and render the cannabis waste. Any random person or existing trash company CANNOT handle cannabis waste. This cannabis waste management company MUST have the appropriate cannabis licenses such as a cannabis distribution license and cannabis manufacturing license (processing license). Since the product that will be picked up is untreated cannabis product (un-rendered cannabis product), the movement of the cannabis requires a distribution license. The distribution license will allow the cannabis waste management company to pick up the untreated cannabis since it is still considered cannabis product, and the manufacturing (processing) license will allow the waste management company to render the cannabis product into neutralized cannabis waste. These licenses not only make the cannabis waste management company compliant, but also help with the track and tracing of all stages of the cannabis product through Metrc since all cannabis license holders need to use the track and trace system. The proposed changes will guarantee that all cannabis waste is being handled by cannabis-permitted companies that have extensive working knowledge in the industry. These changes will ensure that all cannabis waste streams are properly identified and documented through the State's Track and Trace System, and ensure all cannabis operators are working compliantly together.

#30

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 11:49:57 AM
Last Modified: Tuesday, February 06, 2018 12:00:12 PM
Time Spent: 00:10:14
IP Address: 73.92.210.220

Page 1

Q1 First Name (Optional)

Nurit

Q2 Last Name (Optional)

Raphael

Q3 Organization (Optional)

MCCA

Q4 Title (Optional)

President

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

These notes are regarding delivery only (Type 9 license - The above drop down didn't have an option for delivery, believing retailer option should be sufficient here)

1) Security guard at door for "none-store front"

Needing a security / body guard in front of our "none-store front" only draws attention to our location which is not needed, and is also going to cost us more money than most delivery owners can afford. With the proper camera's and security plans that are needed, we find it unnecessary to have use of a guard. There is no public access, which mean's there is no checking ID's or really any sort of work for this guard to do.

2) Tiered delivery vehicles:

The emergency regulations presently require delivery services to use enclosed automobiles with a maximum carrying capacity of \$3,000. Rather than a one-size-fits-all approach, CCDA favors allowing three tiers of delivery vehicles, with varying carrying capacities.

The first, lowest tier, would allow unenclosed vehicles to carry up to \$1,000 of cannabis and cannabis products, while still requiring storage in an enclosed and secured compartment. The second, medium tier, would follow the current regulations and allow for the vehicle to carry up to \$5,000 of cannabis and cannabis products. The third, high tier, would follow the regulations for distributor-transport drivers, with no regulatory cap on their carrying capacity. This would include the requirement for the delivery service to obtain a motor carrier permit.

A tiered structure such as this would reflect the diversity of size and scope of delivery businesses currently in operation in California.

3) Delivery Request Receipts:

The delivery request receipt has several requirements that are both burdensome and invasive for delivery services to comply with. The first being the requirement that every employee involved with the fulfillment of the order be listed and sign on the request receipt. When multiple employees are involved in fulfillment of an order, the company should be able to designate either a primary employee to sign for the document or allow the last employee to review the order to be listed.

Additionally, the delivery request receipt requires delivery services to include the address of their licensed premises on the receipt. This presents significant and unnecessary exposure for businesses that reduce their risk profile by remaining discrete, and a safer solution that follows the intent of the law would be to include their state license number rather than their address.

Thank you for the consideration!

- Nurit Raphael

#31

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 1:22:21 PM
Last Modified: Tuesday, February 06, 2018 1:23:34 PM
Time Spent: 00:01:12
IP Address: 107.77.213.198

Page 1

Q1 First Name (Optional)

Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee**Q6** Feedback for Subcommittee

Topicals are such a hard sell into the clubs, most topical users do not go into clubs. Is that on the radar, would it be possible sell outside of clubs?

#32

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 1:49:35 PM
Last Modified: Tuesday, February 06, 2018 1:50:06 PM
Time Spent: 00:00:30
IP Address: 104.35.34.81

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Retailers Subcommittee**

Q6 Feedback for Subcommittee

The taxes are too high. There is no way to reasonably compete with the black market.

#33

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 1:58:08 PM
Last Modified: Tuesday, February 06, 2018 2:26:06 PM
Time Spent: 00:27:58
IP Address: 99.191.143.199

Page 1

Q1 First Name (Optional)

Bobby

Q2 Last Name (Optional)

V

Q3 Organization (Optional)

www.HERB.delivery

Q4 Title (Optional)

Founder

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

1.) Tiered delivery vehicles:

The emergency regulations presently require delivery services to use enclosed automobiles with a maximum carrying capacity of \$3,000. Rather than a one-size-fits-all approach, CCDA favors allowing three tiers of delivery vehicles, with varying carrying capacities.

The first, lowest tier, would allow unenclosed vehicles to carry up to \$1,000 of cannabis and cannabis products, while still requiring storage in an enclosed and secured compartment. The second, medium tier, would follow the current regulations and allow for the vehicle to carry up to \$5,000 of cannabis and cannabis products. The third, high tier, would follow the regulations for distributor-transport drivers, with no regulatory cap on their carrying capacity. This would include the requirement for the delivery service to obtain a motor carrier permit.

A tiered structure such as this would reflect the diversity of size and scope of delivery businesses currently in operation in California.

2.) Delivery Request Receipts:

The delivery request receipt has several requirements that are both burdensome and invasive for delivery services to comply with. The first being the requirement that every employee involved with the fulfillment of the order be listed and sign on the request receipt. When multiple employees are involved in fulfillment of an order, the company should be able to designate either a primary employee to sign for the document or allow the last employee to review the order to be listed.

Additionally, the delivery request receipt requires delivery services to include the address of their licensed premises on the receipt. This presents significant and unnecessary exposure for businesses that reduce their risk profile by remaining discrete, and a safer solution that follows the intent of the law would be to include their state license number rather than their address.

3.) Facilitate Overnight and Long-Distance Delivery:

The ability to deliver cannabis overnight is questionable at best under the state regulations, as they define a delivery beginning when the driver departs and ending on their return to the retailer, during the hours of 6am and 10pm. A higher security delivery vehicle that meets the standards for distribution-transport should be allowed to transport overnight so long as they are not delivering cannabis to consumers except during the legal operating hours. Additionally, if such a business was operating on a cash-less basis, there should not be a need for the vehicle to return immediately upon conclusion of its route or within the designated hours of operation. Lastly, the regulations should allow for long-distance delivery, whether between multiple drivers or licensed hubs, in order to serve the California marketplace.

#34

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 2:25:44 PM
Last Modified: Tuesday, February 06, 2018 2:27:24 PM
Time Spent: 00:01:39
IP Address: 73.93.155.175

Page 1

Q1 First Name (Optional)

Megumi

Q2 Last Name (Optional)

Reagan

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

To Whom It May Concern:

I'm writing you to express concern over cannabis waste regulations. Cannabis waste comes in innumerable forms. I've found that the layman generally associates cannabis waste with leaves, stalks, stems, and other plant and soil byproducts. However, it's important to note that cannabis waste also includes post-extracted cannabis plants and flowers, failed lab tested materials, ancillary manufactured waste (for example, i.e., wax paper, gloves, beakers, etc.), retail display items, and returned/damaged retail items. These streams of waste come from all industry stakeholders: cultivators, manufacturers, retailers, distributors and testing labs. Handling the volume of waste produced by these stakeholders creates an ancillary industry that must be regulated.

The regulations need to be updated to reflect who is qualified to properly manage cannabis waste. The vast amounts of cannabis waste produced by the industry pose a serious risk to public health, specifically children and the disenfranchised, if not handled by properly licensed cannabis waste haulers as opposed to general waste management service providers. Third party cannabis waste management companies must obtain the proper licenses to transport and render cannabis waste. Frequently, cannabis byproduct and waste are indistinguishable from safe-to-consume materials and/or products. To mitigate these risks, limiting the exposure of the public to cannabis waste vis-a-vis safe and sustainable disposal of cannabis waste that has been tracked and traced and handled by licensed cannabis waste haulers is imperative. It will ensure that all ecosystems—the environment, the public and industry stakeholders can successfully co-exist.

Thank you.

#35

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 3:08:35 PM
Last Modified: Tuesday, February 06, 2018 3:12:14 PM
Time Spent: 00:03:38
IP Address: 99.191.143.199

Page 1

Q1 First Name (Optional)

Bobby

Q2 Last Name (Optional)

V

Q3 Organization (Optional)

www.HERB.delivery

Q4 Title (Optional)

Founder

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Requiring a business with no foot traffic to employ a security guard is a significant burden. They're rather costly and if the non-storefront retailer has a good security plan, they're not of much use.

I have multiple non-storefront retail fulfillment hubs and have completed many thousands of transactions over the course of years and have never had an issue where a guard would've been helpful.

#36

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 4:56:49 PM
Last Modified: Tuesday, February 06, 2018 5:01:05 PM
Time Spent: 00:04:15
IP Address: 47.208.187.157

Page 1

Q1 First Name (Optional)

Charles

Q2 Last Name (Optional)

Willett

Q3 Organization (Optional)

Tahoe Honey Company

Q4 Title (Optional)

Owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Retailers should be able to allow medical patients to only be subjected to the local Sales and use tax NOT the excise tax. This is medicine and should be treated as such. Taxing medical patients the 15% excise tax does nothing but hurt their bottom line and usually these are the people who are on very tight budgets and have fixed incomes. Please amend the statute.

Thank you for your consideration.

#37

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 4:56:44 PM
Last Modified: Tuesday, February 06, 2018 5:01:38 PM
Time Spent: 00:04:54
IP Address: 75.146.84.174

Page 1

Q1 First Name (Optional)

Steven

Q2 Last Name (Optional)

Domingo

Q3 Organization (Optional)

WeDrop

Q4 Title (Optional)

President & CEO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

- Delivery hours should be expanded to accommodate all patient needs, instead the industry should follow the pharmacy model where medication is available during broader hours. Currently, the hours in regulation do not accommodate individuals who work nights, or may need access to medication between the hours of 10 PM to 6 AM.
- The commercial possession amount for delivery drivers to have in the vehicle at any given time is too restrictive and doesn't account for the varying price of product. For example, if you're a business that focuses on high end product, you'd have to make more trips, more often to stay below the \$3,000 retail limit. This should be increased or changed to the wholesale amount.
- On-site consumption should be considered for retail.

#38

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 5:20:58 PM
Last Modified: Tuesday, February 06, 2018 5:25:54 PM
Time Spent: 00:04:56
IP Address: 99.60.57.75

Page 1

Q1 First Name (Optional)

Rebecca

Q2 Last Name (Optional)

Byars

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Please do what you can to make cannabis delivery services more available in our state. Due to the local control piece of prop 64 we are seeing cities across the state deny access to their residents. Cities like Danville and San Ramon have gone even further and told their residents they have to leave the city to obtain their medications. I can understand if cities want to be prudent and see how things go with the adult use side of the industry but to deny a terminally ill patient the right to access the medication that has been helping them seems to go beyond the scope of what a city council should oversee. The regulations are stringent enough on delivery companies. Please find a way to carve out local access for the medical cannabis patients.

#39

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 6:13:40 PM
Last Modified: Tuesday, February 06, 2018 6:21:17 PM
Time Spent: 00:07:36
IP Address: 68.4.85.184

Page 1

Q1 First Name (Optional)

Tyler

Q2 Last Name (Optional)

Chernack

Q3 Organization (Optional)

True Farma

Q4 Title (Optional)

CFO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Hi there. We are a company focused on only the highest quality packaged medical cannabis products and don't sell flower. We have formed partnerships with St. Jude's / St. Joseph's / Hoag Hospitals in the SoCal area to deliver medicine to their patients who have cancer. This is an INCREDIBLE opportunity for the medical cannabis community to be embraced by the healthcare system. We really need to have the ability to have direct-to-patient delivery otherwise these cancer and terminally ill patients will not have the chance to receive the medicine that helps them sleep, eat, ease their pain. Before us, nurses and doctors were sending their patients to WeedMaps. These patients are 55 and older and have no understanding of where to begin with cannabis. We need the ability to educate and deliver them medicine that allows them to go low and slow, not have an adult use dispensary dictate how much they think they should smoke.

These new regulations have caused a huge shortage of medicine options for people all over the state. We get emails by the hundreds from these individuals who need their 1:1 tincture to help them live so they don't have to take opiates. We need a statewide direct-to-patient license for our dispensary, even for just medical cannabis products.

#40

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 6:25:40 PM
Last Modified: Tuesday, February 06, 2018 6:30:55 PM
Time Spent: 00:05:15
IP Address: 67.174.233.8

Page 1

Q1 First Name (Optional)

Jude

Q2 Last Name (Optional)

Thilman

Q3 Organization (Optional)

Dragonfly Wellness Center

Q4 Title (Optional)

Owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

A. Remove Section 5045. Security Personnel in its entirety and modify surveillance equipment requirements. This regulation is an excessive, onerous and impractical requirement for small retail and other businesses that operate in small towns, rural and suburban areas, and medium-sized cities. Cultivators, even under 10,000 sq. ft under the microbusiness requirement, would be hard-pressed to hire a security guard to be on-site 24/7 and actually effectively prevent criminal activity from occurring. For our retail dispensaries in Mendocino County, there has never been a complaint of any criminal activity of any sort by law enforcement. Nor have there been any civil complaints of record, as noted by our Board of Supervisors. We are a quiet, low-population, rural county. It would be hardly cost-effective for us to be required to hire or contract with security personnel, nor would it be effective in preventing something that, in fact, has not happened. In fact, there are no security firms that exist in most of our county. And in many cases, our internet service is sketchy and the required instant cell contact or wi-fi enabled alarm signals are simply a pipe dream. These are impossible regs with which to comply.

#41

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 6:56:39 PM
Last Modified: Tuesday, February 06, 2018 6:57:14 PM
Time Spent: 00:00:34
IP Address: 69.181.184.67

Page 1

Q1 First Name (Optional)

Marco

Q2 Last Name (Optional)

Troiani

Q3 Organization (Optional)

Digamma Consulting

Q4 Title (Optional)

CEO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Chapter 6. Manufactured Cannabis Safety

Subchapter 3. Requirements of Operation

Article 4. Production and Process Controls

We would recommend that stability testing be required for all manufactured cannabis products. The Food and Drug Administration defines Stability Testing states in Guidance for Industry Q1A(R2) Stability Testing of New Drug Substances and Products

“The purpose of stability testing is to provide evidence on how the quality of a drug substance or drug product varies with time under the influence of a variety of environmental factors, such as temperature, humidity, and light, and to establish a retest period for the drug substance or a shelf life for the drug product and recommended storage conditions.”

The patients and adult-use customer of manufactured cannabis products should have some assurance that the product they are taking is reasonably close to what is on the label, and that the effect these products have on them are consistent. Stability testing, storage condition and the use of expiration date are a key set of best practices that increase the likelihood the patient or customer will be receiving a consistent product.

We recommend that a section 40265. Stability Testing between 40264. Batch Production Record, and section 40268. Recalls be added. Below is our proposed text for that section.

(a) Stability testing must be performed on all cannabis products that will be sold to patients or customers through licensed cannabis retailer.

(b) Stability testing is required for each product, as defined by the product's standard operating procedure. If the operating procedure is changed, then the stability test must be repeated for that product.

(c) The stability testing will determine that how long a cannabis product's label components not exceed plus or minus 10% of the label concentrations or amounts at the manufacture recommended storage conditions for that product.

(d) The stability testing will be conducted by a license testing laboratory, as define in Title 16. Division 42. Bureau of Cannabis Control.

(e) The last time point in which the cannabis product meets the conditions in section 40265 (b) will be the maximum expiration period.

(f) The maximum stable period will be reported to the Bureau of Cannabis Control.

(g) The expiration date of a production batch of cannabis product is determined by the adding the manufactured date to the maximum stable period. A manufacture can use an expiration date prior to expiration date when labeling the cannabis product.

#42

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 6:59:53 PM
Last Modified: Tuesday, February 06, 2018 7:01:02 PM
Time Spent: 00:01:09
IP Address: 69.181.184.67

Page 1

Q1 First Name (Optional)

Marco

Q2 Last Name (Optional)

Troiani

Q3 Organization (Optional)

Digamma Consulting

Q4 Title (Optional)

CEO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Chapter 6. Manufactured Cannabis Safety

Subchapter 5. Labeling and Packaging Requirements

Article 2. Labeling Requirements

40408. Informational Panel Labeling Requirements.

Section 40408 (a) start with:

(a) The label for a cannabis product shall include an informational panel that includes the following:

Section 40408 (a) (10) states:

(10) The product expiration date, “use by” date, or “best by” date, if any; and

If stability testing is added to the regulations in section 40265, then expiration date must be determine using the maximum stable period determined in the stability testing of the cannabis product. Furthermore, we would recommend that only the expiration date be used on the label, and “use by” and “best by” date’ be removed as labeling options in section 40408 (a) (10). The new section 40408 (a) (10) would read:

(10) The product expiration date, as determine by the product manufacture date, and the maximum stable period of the product determined by the stability testing in section 40265; and

#43

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 7:58:25 PM
Last Modified: Tuesday, February 06, 2018 7:59:07 PM
Time Spent: 00:00:41
IP Address: 184.23.243.202

Page 1

Q1 First Name (Optional)

Charles

Q2 Last Name (Optional)

Rutherford

Q3 Organization (Optional)

Boveda, Inc.

Q4 Title (Optional)

Business Development Director

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

As a representative of Boveda, Inc., a manufacturer of humidity control technology designed for cannabis flower, I have concern with the emergency regulations released by the Bureau of Cannabis Control (BCC) on 12/7/2017. Specifically, we have concern over the lack of a definition for “dry-weight ounce” and absence of a minimum acceptable moisture content (MC) and water activity level (Aw) to define a range of what is acceptable to enter the commercial market for quality control purposes. As cannabis is sold in a natural, minimally processed state, it is subject to changes in moisture content and weight in response to environmental conditions.

We see defining “dry-weight ounce” as a critical point because the dryness of cannabis flower and leaves affects the weight of the product. By not defining a range of acceptable MC and Aw when cannabis enters the market for cultivation taxation and sale, and then using those ranges to define a “dry-weight ounce,” there is an absence of quality control as the flower enters the commercial market and moves through the supply chain to reach the consumer at the retail level.

In the released emergency regulations §5717, the BCC has set a maximum acceptable limit for MC at 13%, and AW at 0.65 for cannabis, which ensures the safety of the cannabis from microbial growth. But they set no minimum limit, thus not defining “dry-weight ounce,” which turns what should be a standardized measurement into a range of possibilities. We have data to show that retailers throughout the state are selling packaged cannabis flower that fluctuates in weight by as much as 20% under the labeled weight. Additionally, without setting a minimum acceptable limit, the product will continue to dry out as it sits in inventory at a retailer.

The California Department of Food and Agriculture’s Division of Measurement Standards and individual county agencies are responsible for verifying the quantity of bulk and packaged commodities in the retail market. When a consumer purchases a product that is packaged and sold by weight, they have an expectation that they will receive the total labeled amount. Much like a 16 ounce bag of almonds should contain the full 16 ounces, and a gas station pump should dispense a full gallon, retail cannabis should contain the full labeled quantity. With the adoption of a definition for “dry-weight ounce” and a minimum acceptable moisture content (MC) and water activity level (Aw), packaged cannabis flower will be kept in a stable state, consumers will know they are receiving the entire weight that they are paying for.

It is for all these reasons that we believe the Cannabis Advisory Committee should recommend the BCC make these clarifications in future regulations. Based on research and our field experience with Aw levels, it is our recommendation that the following changes be made to the BCC’s regulatory language:

§5717 (b) should deem a cannabis sample as passing water activity testing if Aw is at or above 0.55 and at or below 0.65

§5717 (c) should deem a cannabis sample as passing moisture content testing if MC is at or above 5% and at or below 13%

Create a definition for “dry-weight ounce” using the ranges for Aw and MC recommended above

My colleagues and I are available to discuss the importance of these recommendations, which if implemented, will help protect the public health and safety of legal consumers of cannabis products. Please contact me at (952) 745-2905 or charles.rutherford@bovedainc.com if you have any questions regarding my comments.

#44

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 8:25:47 PM
Last Modified: Tuesday, February 06, 2018 8:26:35 PM
Time Spent: 00:00:47
IP Address: 162.201.66.29

Page 1

Q1 First Name (Optional)

Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Mendocino Generations

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

February 6th, 2018

Dear Subcommittee Members,

We write to you today, as a group of small farms located throughout Mendocino County, to express our concerns with the current cannabis emergency regulations and are providing input on changes we would like to see made in the new regulations. We are grateful for the opportunity as stakeholders and interested parties to engage in this process. We hope that our suggestions will be considered when drafting the new regulations so that the cannabis-licensing program can operate with efficiency and success.

The largest license type allowed in Mendocino County is 10,000 sq ft of plant canopy. This equates to less than a quarter acre and considered a "hobby garden" by agricultural standards.

State regulations must take the vast disparity in permitted size cultivations throughout the state into consideration as permanent regulations are formulated. Committees must understand the historical significance and economic dependence of counties in the north coast region on cannabis cultivation. Small cannabis farmers need state protection to continue into the regulated and legal era to allow for a viable transition and avoid epidemic bankruptcies, defaults, plummeting property tax revenues and destruction of a unique cultural fabric that can be the regions opportunity rather than its demise.

Various compliance issues imposed specifically on the cannabis industry, and no other agricultural industry in California, by CDFA,

Cannabis Advisory Committee: Subcommittee Input Survey

CWQCB, Cal Fire, CDFW, and a slew of local jurisdictions are simply not viable for small farmers if scale, rural access, cooperative efficiencies and considerations for sustainable methods are not protected by the BCC.

Even though some small farmers may diversify into processing and or low impact manufacturing as regulations allow, our primary concern at this writing is for the small farmer, terrified that their homes, livelihood and decades of investments in the development of methods and genetics will arbitrarily be taken from them by the BCC if the ACA does not act now on their behalf.

Small cannabis cultivators must be afforded the same considerations and protections as other small agricultural endeavors like small vineyards, artisan breweries and related boutique style retailing of their products. As stated in SB94 and its incorporation into Business and Professional Code 26013(c), upon which all cultivators in the state relied under MAUCRSA, "mandate only commercially feasible procedures, technology or other requirements, and shall not unreasonably restrain or inhibit the development of alternative procedures or technology to achieve the same substantive requirements, nor shall such regulations make compliance so onerous that the operation under a cannabis license is not worthy of being carried out in practice by a reasonably prudent business person".

REGARDING RETAILING:

1. Modify Section 5602 to allow small farmers and cooperatives to sell directly to customers at special events, fairs and farmers' markets as well as direct to patients.
2. Modify Section 5601 to expand the definition of cannabis events where direct cultivator and/or micro-business sales can occur. Local jurisdictions should have the authority to identify an event for cannabis sales within their jurisdiction.
3. Micro-business licensees must be able to establish retail locations on premises separate from the cultivation site.

Thank you for your consideration and support,

Audrey's Farm
Big Dirty Farms
Briza Botanicals
Brother Bee Farms
Coastal Ridge Botanicals
Emerald Naga Farms
Empire Gardens
Flatbed Ridge Farms
Fire Flower Farm
Full Sun Farms
Giving Tree Farms
Granny Jacks
Gypsy Wagon Farms
Herbanology Farms
Higher On The Hog Farms
Hummingbird Farms
Laughing Farms
Le Foret
Magnolia & Fig Cultivars
Mendocino Grasslands
Mendocino Organic Medicine
Moongazer Farms
Oak Knoll Farms
One Feather Ranch
Potter Valley Farms
Reach High Farm
River Txai Farms
- - -

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Sensi Farms

Sun N Moon Ranch

Sunbright Gardens

Sweet Sisters Family Farm

UV Organics

#45

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 9:05:58 PM
Last Modified: Tuesday, February 06, 2018 9:08:37 PM
Time Spent: 00:02:38
IP Address: 64.194.161.33

Page 1

Q1 First Name (Optional)

Holly

Q2 Last Name (Optional)

Carter

Q3 Organization (Optional)

Redwood Roots

Q4 Title (Optional)

CCO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Direct markets are an interface opportunity to retain producer to patient relationships established under 215/420, and give ability for producers to bring value added product.

Events need to maintain the storage and security for retailers/distributors.

We look forward to the availability for onsite consumption.

#46

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 10:06:57 PM
Last Modified: Tuesday, February 06, 2018 10:07:50 PM
Time Spent: 00:00:52
IP Address: 198.59.53.14

Page 1

Q1 First Name (Optional)

Dustin

Q2 Last Name (Optional)

Moore

Q3 Organization (Optional)

International Cannabis Farmers Association

Q4 Title (Optional)

Executive Director

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Direct to Consumer Sales for Farmers at Compliant Events

Comment: Many small farmers are challenged by the cost of regulatory expense facing them and are often operating in rural communities that do not have access to a thriving retail markets and may be located hours from licensed distribution facilities. ICFA is committed to working with regulatory agencies to achieve the ability for Cottage, Specialty and Small type licensed farmers to engage in distribution transportation activities as part of their cultivation license. ICFA also recognizes the importance of direct to consumer access for farmers, such as has been made available pre-2018 through events like the Emerald Cup, Emerald Exchange, and the Healing Harvest Farms' Farmer's Markets. With that said, ICFA is committed to working with regulatory agencies to expand the event licensing sales provisions to allow Cottage, Specialty and Small farmers the ability to conduct retail sales at compliant cannabis events without needing a 'retail' license type. ICFA proposes that the ability to participate in event sales be allowed as part of the cultivation license so long as the licensee uses a licensed distributor to transport the product to the event, and uses a State compliant, Point of Sale system to track all sales conducted at the event.

#47

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 10:36:02 PM
Last Modified: Tuesday, February 06, 2018 10:42:03 PM
Time Spent: 00:06:01
IP Address: 73.241.110.133

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional)

Dispensary Manager

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Retailers Subcommittee**

Q6 Feedback for Subcommittee

Please reconsider not allowing free gifts and tracking destruction of product. A rewarding side of working in the industry was being able to gift free cannabis and cannabis products. From vendors giving free product to hard working staff, to making a purchaser delighted by a free gift, to giving to the less fortunate something to look forward to whether it was being able to chat with people who would listen or receiving their relief medicine that they wouldn't be able to afford. This industry values giving and being able to provide that without a monetary exchange was a huge part of the job.

#48

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Started: Tuesday, February 06, 2018 10:42:07 PM
Last Modified: Tuesday, February 06, 2018 10:43:26 PM
Time Spent: 00:01:18
IP Address: 73.93.81.251

Page 1

Q1 First Name (Optional)

Valerie Leveroni

Q2 Last Name (Optional)

Corral

Q3 Organization (Optional)

WAMM - Wo/Men's Alliance for Medical Marijuana

Q4 Title (Optional)

Director, Co-Founder

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Since our inception in 1993 WAMM, the Wo/Men's Alliance for Medical Marijuana in Santa Cruz California, has openly assisted thousands of patients, providing in-home care, support services, end of life assistance, and cannabis therapies on a donation basis. WAMM is the longest running medical marijuana organization in the US and functions solely to reduce human suffering through the healing process including up to the moment of death.

For 25 years we have worked closely with the City and County of Santa Cruz to provide our unique brand of service. We have been at the vanguard of the medical marijuana movement, achieving national and international recognition through our model of Compassionate Access. WAMM provides unparalleled service that has inspired a generation and served thousands of seriously ill people. Continuing to build on the foresight that sustained a generation and led to the recognition of civil liberty for patients and eventually legalization of cannabis, brings with it the opportunity for our state to capitalize on increased tax revenues.

Compassionate Access

As we observe a burgeoning cannabis industry flourish, each day increasing numbers of patients are less able to access cannabis to meet their needs. 643,000 American are driven to bankruptcy due to medical bills each year, with Californians making up over 17% of those claims. Today our efforts to maintain philanthropy and public service are even greater than ever before, because seriously ill and dying people are not being served by those profiting from the cannabis trade. While governments cannot "legislate compassion," surely efforts to sustain the momentum that has distinguished WAMM and the cannabis compassion movement fuels the potential for legislative action that promotes replicable compassion models.

I don't know the answer; perhaps a type of tax credit, a small business benefit, an enticement program, reallocation of tax funds, or another avenue that equates the relief of human suffering with that of financial gain. Whatever legal framework that you choose to complement our renowned compassion model, will carry your signature. This is a message that we can carry to the world, reminding that when such a responsibility is shared the impact is exponential.

Even if a lack of personal experience lay at the core of our state's legislative failure to include a mechanism for compassionate access, each of us - citizens, our communities, the state as a whole, and every corporate structure - have a social responsibility. To ignore this has profound human consequences.

This is your job. Please allow us to help you, to help relieve suffering.

Sincere regards,

Valerie Corral

#49

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 11:08:49 PM
Last Modified: Tuesday, February 06, 2018 11:17:48 PM
Time Spent: 00:08:59
IP Address: 173.228.119.237

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Retailers Subcommittee**

Q6 Feedback for Subcommittee

What recourse do licensees have for unpaid bills when businesses are offering terms?

#50

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 11:17:51 PM
Last Modified: Tuesday, February 06, 2018 11:18:40 PM
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IP Address: 173.228.119.237

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Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Retailers Subcommittee**

Q6 Feedback for Subcommittee

Risk of testing and loss of product should be at the cultivation stage.

#51

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 11:53:51 PM
Last Modified: Tuesday, February 06, 2018 11:54:24 PM
Time Spent: 00:00:32
IP Address: 71.146.0.203

Page 1

Q1 First Name (Optional)

Genine

Q2 Last Name (Optional)

Coleman

Q3 Organization (Optional)

Mendocino Appellations Project

Q4 Title (Optional)

Executive Director

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

Rural cannabis producing regions facing production restrictions will be unable to compete with emerging large scale production, and are in immediate need of regulatory frameworks supporting direct sales for farmers, manufacturers and nurseries at cannabis events, with expanded venue allowances.

#52

Collector: Web Link 1 (Web Link)
Started: Wednesday, February 07, 2018 9:48:36 AM
Last Modified: Wednesday, February 07, 2018 9:51:49 AM
Time Spent: 00:03:12
IP Address: 107.77.200.136

Page 1

Q1 First Name (Optional)

Dana

Q2 Last Name (Optional)

Cisneros

Q3 Organization (Optional)

Cannabis Corporate Law Firm

Q4 Title (Optional)

Lead Attorney

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Retailers Subcommittee

Q6 Feedback for Subcommittee

What is the state doing to encourage Cities to open up to commercial cannabis activities? Failure to expand the market will result in continued black market activity.